

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

ANNE BLOCK, an individual

Plaintiff,

vs.

SNOHOMISH COUNTY, a Washington County and Municipal Government; THE CITY OF GOLD BAR, a Washington Municipal Corporation; JOE BEAVERS, individually and in his capacity as defendant City of Gold Bar Council Member, Mayor and Public Records Officer; CRYSTAL PENNINGTON (nee HILL), her marital community with defendant John Pennington, her husband, individually, and in her official capacity as defendant City of Gold Bar Mayor; FLORENCE DAVI MARTIN, individually and in her official capacity as defendant City of Gold Bar Council Member; CHRISTOPHER MICHAEL WRIGHT, individually and in his official capacity as defendant City of Gold Bar Council Member; TAMERA DOHERTY, individually and in her official capacity as defendant Snohomish County Department of Emergency Management Assistant Deputy Director; JOHN PENNINGTON, his marital community with defendant Crystal Pennington, his wife, individually, and in his official capacity as Director of Snohomish County Department of

Civil Case No.

COMPLAINT FOR:

1. 42 USC § 1983 VIOLATIONS-DAMAGES, and EQUITABLE RELIEF, and
2. 42 USC § 1988 COSTS and ATTORNEY FEES

JURY TRIAL DEMANDED

Emergency Management; AARON REARDON individually and in his official capacity as Snohomish County Executive; KEVIN HULTEN individually and in his official capacity as an employee of defendant Snohomish County; CHRISTOPHER SCHWARTZEN, individually and in his official capacity as an employee of defendant Snohomish County; BRIAN PARRY, individually and in his official capacity as an employee of defendant Snohomish County; JON RUDICIL individually and in his official capacity as an employee and public records officer of defendant Snohomish County; DIANA ROSE, individually and in her official capacity as an employee and public records officer for defendant Snohomish County.

Defendants

Comes now the Plaintiff, Anne Block, and for causes of action pursuant to 42 USC §§ 1983 and 1988 against the above named defendants alleges as follows:

I. JURISDICTION AND VENUE

1.1 The acts and omissions alleged in this Complaint occurred within the geographical and jurisdictional boundaries of the United States District Court for the Western District of Washington by persons located and residing therein.

1.2 The causes of action alleged herein constitute a case or controversy within the meaning and requirements of the Article III § 2 of the United States constitution, and the Plaintiff has standing to bring this action.

1.3 This Court has jurisdiction to adjudicate the federal questions and claims asserted herein, and to provide requested remedies pursuant to 28 USC § 1331, 42 USC § 1983 and 42 USC § 1988. The defendants are persons, who acted under color of state and local law,

1 who have deprived the Plaintiff of liberty and due process rights secured by the First,
2 Fifth and Fourteenth Amendments to the United States constitution, retaliating against
3 Plaintiff for her exercise of those rights, and proximately causing the damages more
4 explicitly set out below.

5 II. PARTIES

6 **2.1 PLAINTIFF BLOCK:** The plaintiff, Anne Block, is a single woman who is
7 competent to bring this action. She resides within the City of Gold Bar, is a citizen
8 thereof and is an attorney licensed to practice in the State of Washington, with an office
9 in Monroe, Washington. She has exercised speech and petition rights secured to her by
10 the First and Fourteenth Amendments to the United States Constitution. For exercising
11 her constitutional rights the defendants conducted a campaign of prohibited retribution
12 and retaliation, individually and collectively. All of the Defendants acted under color of
13 law and / or in concert and agreement with other persons acting under color of law.
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15 **2.2 DFENDANT SNOHOMISH COUNTY:** Defendant Snohomish County Washington
16 is a Washington State County and Municipal Corporation whose officials and
17 employees, as a matter of policy, custom and usage of the County, and with the power
18 conferred upon them by Snohomish County, retaliated collectively and in concert and in
19 agreement with the other named defendants against the Plaintiff to wrongfully injure
20 Plaintiff for exercising her First Amendment Rights.

21 **2.3 DEFENDANT CITY OF GOLD BAR:** Defendant City of Gold Bar is a Washington
22 Municipal Corporation whose officials and employees, as a matter of policy, custom and
23 usage of the City, and with the power conferred upon them by the City of Gold Bar,
24 retaliated collectively, in concert and in agreement with the other named defendants
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1 against the Plaintiff to wrongfully retaliate against and injure her for exercising her First
2 Amendment rights. The City of Gold Bar appoints members to its Finance Committee,
3 refuses to post meeting notices for said Committee, and has violated the Open Public
4 Meetings Act by holding meetings outside and refusing to allow citizens to participate ,
5 which wrongly delegated arbitrary and capricious authority to both City officials and
6 friends of city officials, in violation of the petition, speech, due process and equal
7 protection rights and liberties guaranteed to Plaintiff and other citizens by the First, Fifth
8 and Fourteenth Amendments to the US constitution. The City of Gold Bar also adopted
9 Resolution 14-10, which wrongly delegated arbitrary and capricious authority to City
10 officials in violation of the petition, speech, due process and equal protection rights and
11 liberties guaranteed to Plaintiff and other citizens by the First, Fifth and Fourteenth
12 Amendments to the US constitution.

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14 **2.4 DEFENDANT JOE BEAVERS:** Defendant Joe Beavers is the Mayor of the City of
15 Gold Bar, acted and lives within the geographical and jurisdictional boundaries of this
16 court. He is a person who, individually and in concert and agreement with other persons,
17 acted under color of law to deprive Plaintiff of rights guaranteed by the United States
18 constitution by retaliating against her for exercising those rights. He conspired with
19 others to retaliate against the Plaintiff.

20 **2.5 DEFENDANT FLORENCE DAVI MARTIN** is a council member for the City of
21 Gold Bar, acted and lives within the geographical and jurisdictional boundaries of this
22 court. She is a person who, individually and in concert and agreement with other
23 persons, acted under color of law to deprive Plaintiff of rights guaranteed by the United
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1 States constitution by retaliating against her for exercising those rights. She conspired
2 with others to retaliate against the Plaintiff.

3 **2.5 DEFENDANT CRYSTAL PENNINGTON:** Defendant Crystal Pennington (nee
4 Hill) was, at material times, the Mayor of the City of Gold Bar, acted and lives within
5 the geographical and jurisdictional boundaries of this court. She is a person who,
6 individually and in concert and agreement with other persons, acted under color of law to
7 deprive Plaintiff of rights guaranteed by the United States constitution by retaliating
8 against her for exercising those rights. She conspired with others to retaliate against the
9 Plaintiff. She is currently the wife of Defendant Snohomish County employee John
10 Pennington, and they constitute a marital community under the laws of the State of
11 Washington.

12 **2.6 DEFENDANT CHRISTOPHER MICHAEL WRIGHT:** Defendant Christopher
13 Michael Wright was at material times a member of the City Council for the City of Gold
14 Bar, who acted and lives within the geographical and jurisdictional boundaries of this
15 court. He is a person who, individually and in concert and agreement with other persons,
16 acted under color of law to deprive Plaintiff of rights guaranteed by the United States
17 constitution by retaliating against her for exercising those rights. He conspired with
18 others to retaliate against the Plaintiff.

19 **2.7 DEFENDANT JOHN PENNINGTON:** Defendant John Pennington is the Director
20 of the Snohomish County Department of Emergency Management, who acted and lives
21 within the geographical and jurisdictional boundaries of this court. He is a person who,
22 individually and in concert and agreement with other persons, acted under color of law to
23 deprive Plaintiff of rights guaranteed by the United States constitution by retaliating
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1 against her for exercising those rights. He conspired with others to retaliate against the
2 Plaintiff. He is currently the husband of Defendant Crystal Pennington, and they
3 constitute a marital community under the laws of the State of Washington.

4 **2.8 DEFENDANT AARON REARDON:** Defendant Aaron Reardon was at all material
5 times the County Executive for Snohomish County. He acted and lives within the
6 geographical and jurisdictional boundaries of this court. He is a person who, individually
7 and in concert and agreement with other persons, acted under color of law to deprive
8 Plaintiff of rights guaranteed by the United States constitution by retaliating against her
9 for exercising those rights. He conspired with others to retaliate against the Plaintiff.

10 **2.9 DEFENDANT DIANA ROSE:** Defendant Diana Rose was at all material times the
11 employee and public records officer for Snohomish County's Department of Emergency
12 Management. She acted and lives within the geographical and jurisdictional boundaries
13 of this court. She is a person who, individually and in concert and agreement with other
14 persons, acted under color of law to deprive Plaintiff of rights guaranteed by the United
15 States constitution by retaliating against her for exercising those rights. She conspired
16 with others to retaliate against the Plaintiff.

17 **2.10 DEFENDANT KEVIN HULTEN:** Defendant Kevin Hulten was at all material
18 times an employee and assistant to Snohomish County Executive Aaron Reardon. He
19 acted and lives within the geographical and jurisdictional boundaries of this court. He is
20 a person who, individually and in concert and agreement with other persons, acted under
21 color of law to deprive Plaintiff of rights guaranteed by the United States constitution by
22 retaliating against her for exercising those rights. He conspired with others to retaliate
23 against the Plaintiff.
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2.12. **DEFENDANT JON RUDICIL:** Defendant Jon Rudicil was at all material times an employee and assistant to Snohomish County Executive Aaron Reardon. He acted and lives within the geographical and jurisdictional boundaries of this court. He is a person who, individually and in concert and agreement with other persons, acted under color of law to deprive Plaintiff of rights guaranteed by the United States constitution by retaliating against her for exercising those rights. He conspired with others to retaliate against the Plaintiff.

2.13 **DEFENDANT TAMERA DOHERTY:** Defendant Tamera Doherty was at all material times the employee and assistant Deputy to Snohomish County Director of Emergency Management for defendant Snohomish County. She acted and lives within the geographical and jurisdictional boundaries of this court. She is a person who, individually and in concert and agreement with other persons, acted under color of law to deprive Plaintiff of rights guaranteed by the United States constitution by retaliating against her for exercising those rights. She conspired with others to retaliate against the Plaintiff.

2.14 **DEFENDANT CHRISTOPHER SCHWARTZEN** was at all material times an employee and assistant to Snohomish County Executive Aaron Reardon. He acted and lives within the geographical and jurisdictional boundaries of this court. He is a person who, individually and in concert and agreement with other persons, acted under color of law to deprive Plaintiff of rights guaranteed by the United States constitution by retaliating against her for exercising those rights. He conspired with others to retaliate against the Plaintiff.

1 2.15 **DEFENDANT BRIAN PARRY** was at all material times an employee and
2 assistant to Snohomish County Executive Aaron Reardon. He acted and lives within the
3 geographical and jurisdictional boundaries of this court. He is a person who,
4 individually and in concert and agreement with other persons, acted under color of law to
5 deprive Plaintiff of rights guaranteed by the United States constitution by retaliating
6 against her for exercising those rights. He conspired with others to retaliate against the
7 Plaintiff.

8 **III. FACTUAL ALLEGATIONS**

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10 3.1 Plaintiff Block is an attorney, a civil rights advocate and a citizen of the City of
11 Gold Bar and the County of Snohomish. Plaintiff also has a blog called the “Gold Bar
12 Reporter,” which reports on government and government officials in Snohomish County
13 and Gold Bar. As early as 2008 and continuing to the present day the Plaintiff learned of
14 misfeasance, malfeasance, and corruption within city and county government, and has
15 attempted to exercise her rights guaranteed by the speech and petition provisions of the
16 First Amendment to the United States constitution to learn and report on the ongoing
17 activities of county and city officials up to the date of filing this complaint.

18 3.2 The City of Gold Bar channels its citizen’s First Amendment speech and petition
19 rights through a system of formal written public records requests and responses, as does
20 Snohomish County.

21 3.3 Plaintiff first began attempting to get information from the City of Gold Bar in
22 late 2008 by filing petitions with the city known as Public Records Requests. (“PR
23 requests”) The initial PR requests attempted to learn information about alleged
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1 tampering of the city's water wells, theft of city funds by its water employees, and a
2 "settlement" allegedly approved by then Mayor Crystal Hill to compensate the employee
3 for the termination of the employee's job. The early requests included requests for
4 copies of electronic communications, including e-mails and records relating to the
5 tampering of the City's water system. The City was not equipped or organized to
6 respond to such citizen requests. City e-mail traffic, for example, existed in some
7 instances only on the private cell phones, computers, Blackberries and such owned by
8 city officials, such as Mayor Hill and Gold Bar city council members. Other forms of
9 information existed in paper form only, and the city had no network among city
10 computers or organization of information electronically stored on the various parts.
11 Eventually, the City was forced to hire an IT specialist and attorneys to gather city
12 information from private devices owned by its officials and to set up the city system for
13 responding to citizen petitions for information. The city, the city mayor and city council
14 member defendants named above resisted and stalled in response to the PR requests, and
15 responses were tardy and incomplete, which spawned additional PR requests, many of
16 which are still outstanding. They agreed among themselves to retaliate against the
17 Plaintiff.
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19 3.4 The following list of retaliatory acts, though not exhaustive, were typical of the
20 continuous and ongoing retaliatory actions of the defendants City of Gold Bar, and its
21 Mayor and City Council members:

- 22 a) Agreed to harm my law practice, my finances, my emotional health, my
23 reputation and my physical safety;
24 b) Accused me of being mentally ill;
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- 1 c) Maligned and untruthfully belittled my law practice;
- 2 d) Filed, in conjunction with Defendants Crystal (Hill) Pennington, Joe Beavers,
- 3 city attorneys Margaret King and Mike Kenyon, WSBA complaints against me
- 4 using public resources;
- 5 e) Published on its web site the names of citizens making PR requests, designed to
- 6 chill the exercise of First Amendment Rights within the city;
- 7 f) Publicly claimed that Plaintiff was responsible for the city's technical and legal
- 8 costs incurred by the city to retrieve scattered information and costs incurred by
- 9 the city to comply with state law regulating Public Records requests, an
- 10 obligation that had existed, but been neglected by the city, since 1972 when the
- 11 state statute required compliance, and before that pursuant to the First
- 12 Amendment to the United States constitution.
- 13 g) Publically stating to another city council member that "I have no use for non-
- 14 Christians like Block."
- 15 h) Telephoned federal administrative law judge in San Francisco where I practice
- 16 administrative law pursuant to the Equal Employment Opportunity Commission
- 17 to complain of my first amendment activity and contacted and interfered with
- 18 client organizations for supposed, but non-existent, information regarding me;
- 19 i) Contributed defamatory, derogatory, untruthful and harmful articles about me to
- 20 the Sky Valley Chronicle, an on-line blog-newspaper at least partly controlled by
- 21 defendants Aaron Reardon, Christopher Schwarzen, John Pennington, Brian
- 22 Parry, and Joe Beavers, and Crystal Pennington. City of Gold Bar's Mayor Joe
- 23 Beavers and Council members Christopher M. Wright and Florence Davi Martin
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1 encouraged the Sky Valley Chronicle and through postings incited and
2 encouraged ridicule of, threatened violence against, the Plaintiff;

3 j) Ignored criminal complaints I filed with city and county law enforcement officers
4 concerning persons sent by the defendants to my law office to scatter contents,
5 and to my home to toss litter, dead rats, and debris onto my yard and to warn me
6 to “stop or pack up and leave.”

7 k) Publishing false information about me.

8 l) Refused to protect all records relating to me from loss or destruction, even after
9 receiving a litigation hold to preserve all records relating to me.

10 m) Held city council meetings in violation of Gold Bar Ordinance 2.04.020 which
11 mandates agendas and limits public comments. Instead the City held “Town
12 Hall” style meetings, allowing friends of the council and/or mayor to speak and
13 shout and disrupt meetings freely from the audience. They also threatened my
14 life, and physical safety at those meetings;

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16 n) In October 2010 adopted Gold Bar Ordinance/ Resolution 10-14, which
17 purported to delegate unfettered, arbitrary and capricious power to the city public
18 records official, defendant Beavers in this case, to sort and delay public records
19 requests he deemed “long.” The city and Beavers use the ordinance to promptly
20 provide records to the mayor’s friends, but to place other requests from Plaintiff
21 and other Gold Bar open government supporters on indefinite hold. The
22 ordinance contains no standards to guide exercise of the discretion delegated and
23 is an artifice to justify the city’s opposition to, and evasion of, Plaintiff’s First
24 Amendment rights, which still are ignored and/or mostly unanswered as late as
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2009. That city ordinance also arbitrarily restricts city response time to “12 hours per month,” at a time when: 1) water employees have stolen from the city and been rewarded; 2) the city clerk stole from the city; 3) the city bank account was “hacked” for more than \$400,000.00 dollars over a multi-month period; 4) the city has been transferring money wrongfully from a dedicated “water fund” utility account to its general account; 5) created a Storm Water Drain Fund to cover up the City’s misappropriation of public funds from the Street Water Fund to fund litigation since 2009; 6) city employees and officials have used city vehicles and equipment for personal use; 7) the city budgeting process is deliberately abused to cover and implement the malfeasance; 8.) city answered public records request for friends without placing friends of city staff on city’s priority list; 9.) defendants’ employees were using the Sky Valley Chronicle to write and post defamatory and untruthful articles about Plaintiff; and 10.) the Mayor of Gold Bar, Crystal Hill, a non-lawyer, was writing legal divorce papers on behalf of defendant John Pennington, and defendant county employee Rick Kammerer, and using Snohomish County and Gold Bar servers and equipment to accomplish the document preparation. Given the circumstances, placing a 12 hour monthly limit on PR request responses is arbitrary and capricious, especially when combined with the arbitrary powers to delay PR requests indefinitely, which the same ordinance also delegated to the mayor. The ordinance constitutes official retaliation against the Plaintiff and other citizens exercising First Amendment rights of speech and petition.

- 1 o) Defendant Gold Bar and officials conspired with Defendant John Pennington
2 and Snohomish County to access and retrieve from the Washington State Patrol
3 and the Federal Bureau of Investigation my criminal history, and the history of
4 other persons exercising First Amendment rights, and to receive and disseminate
5 the same. Though no actual criminal history existed, they disseminated the
6 information ambiguously as though it constituted criminal history.
- 7 p) Defendant Gold Bar and officials conspired with Defendant John Pennington and
8 Snohomish County to access and retrieve my mental health history. Though they
9 retrieved history for some other person, they characterized it as mine and
10 disseminated it to others in retaliation for my exercise of First Amendment rights.
- 11 q) Defendant Snohomish County's public records officer Diana Rose physically
12 removed county records delivering public records to the City of Gold causing
13 injury to public record/s;
- 14 r) The City of Gold Bar, through its mayor Defendant Beavers, conspired with
15 Defendants Pennington, Reardon, Hulten and Rudicil to post a "attack piece"
16 against Plaintiff on Wikipedia, the on-line encyclopedia. Though Wikipedia
17 immediately withdrew the "hit piece" Mayor defendant Beavers disseminated a
18 copy of the article to multiple persons, untruthfully claiming it to be embraced by
19 Wikipedia;
- 20 s) Defendants' city and Beavers spread the malicious and untruthful rumor that
21 Plaintiff had huge monetary judgments against her, had been treated at a mental
22 hospital, and had been arrested numerous times.
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1 t) The City and Defendants Crystal Pennington wrongly and untruthfully
2 misrepresented to the Washington Coalition for Open Government that Plaintiff
3 is an unemployed attorney who has been treated in a mental health facility.

4 u) The Defendants city and Beavers wrongly filed a lien against a residence (
5 Homestead) owned by me and my partner.

6 v) The City of Gold Bar and defendants Beavers, Wright and Martin used council
7 meetings to publically ridicule and defame my name.

8 w) Defendant Gold Bar called Executive Sessions at which time the City and its
9 attorneys mainly discussed “shutting down the Gold Bar Reporters.”

10 x) Defendant Beavers assaulted me by throwing a compact disk of requested city
11 records against my chest upon arriving at City Hall to pick up public records, and
12 issued city press releases critical me.

13 y) Defendant City of Gold Bar council member/s continue to use private email
14 addresses for government communication;

15 z) Defendant City of Gold Bar posted settlement offers from me on its city website,
16 but did not post other settlement offers and agreements it made with other
17 citizens.
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19 3.5 Defendant City of Gold Bar refuses to allow public monitoring of its Finance
20 Committee. The Washington State Auditor in December 2013 issued findings against
21 the city as a result of making inter-loan fund transfers to fund litigation with no means to
22 pay back its loans, and cited the City’s Finance Committee for failing to fulfil its duties
23 of providing oversight to city’s expenditures. Defendant City’s Finance Committee
24 operates without public postings, allows city officials only to appoint friends to hide
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1 their malfeasance of spending outside of the city's budget, and has no Ordinance
2 permitting such meetings.

3 3.6 Defendant Snohomish County delegated its public records responsibilities to
4 Defendant Aaron Reardon, who in turn designated public records officers for the County
5 and its departments, delegating to them the obligation to respond to public records
6 requests. Defendants John Pennington, Jon Rudicil and Kevin Hulten were Snohomish
7 County employees under the supervision of Snohomish County Deputy Director Gary
8 Haackenson, and under direct authority of Defendant Aaron Reardon during all material
9 times. Plaintiff, after learning of Defendant John Pennington's involvement with Gold
10 Bar Mayor Crystal Pennington (nee Hill) regarding personal legal work on government
11 equipment and servers, filed public records requests with Snohomish County and City of
12 Gold Bar seeking copies of electronic communications between Crystal Hill and between
13 John Pennington. Additional PR requests followed incomplete responses, and upon
14 learning that Snohomish County Executive—Defendant Aaron Reardon---was paying
15 with taxpayer money for out of town trysts with two women. Petitions for recall of
16 elected Snohomish County and City of Gold Bar officials followed, including petitions
17 against Defendants Aaron Reardon and Joseph Beavers, Christopher M. Wright and
18 Florence Davi Martin.
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20 3.7 On or about February 7, 2013, I reviewed via a public records response from defendant
21 City of Gold which included a Wikipedia attack piece about me. Although the Wikipedia
22 attacked piece included information that was not true, they disseminated the information
23 to council members ambiguously as though it constituted truth.
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1 3.8 On February 14, 2013, the Snohomish County Daily Herald exposed Defendant
2 Snohomish County employees Rudicil and Hulten as two of the authors of the Wikipedia
3 and Twitter attack sites created using county resources.

4 See (<http://www.heraldnet.com/article/20130214/NEWS01/702149999>)

5 3.9 In May 2013, Snohomish County Aaron Reardon Executive resigned partly as a
6 result of the Daily Herald's February 14, 2013 expose', and within one week of
7 Reardon's resignation, Snohomish County Executive John Lovick was appointed to fill
8 Reardon's tenure through 2014. Lovick is currently serving as Executive, and defendants
9 Pennington, Schwarzen, and Parry serve at the will (non-union employees) of
10 Snohomish County Executive Lovick.

11 3.10 Defendants Snohomish County, Aaron Reardon, John Pennington, Jon Rudicil
12 and Kevin Hulten, Brian Parry and Christopher Schwarzen, ("County defendants")
13 agreed with the Defendant City of Gold Bar and the Defendant City officials to retaliate
14 against the Plaintiff in the ways identified in paragraph 3.4 above. In addition, the
15 County Defendants agreed with each other, and singly and in combination, retaliated
16 against the Plaintiff for exercising her First Amendment Rights. Though the list is not
17 exhaustive, the following typify the retaliation caused by the County Defendants:
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- 19 a) Snohomish Co. instructed Defendant John Pennington concerning "cyber
20 stalking," and used its Sheriff's Officer to gather evidence from Defendant City
21 of Gold Bar and former mayor Crystal Pennington (nee Hill) to attempt to
22 support a citizen criminal complaint subsequently filed by Pennington / Hill
23 against the Plaintiff for cyber stalking. The complaint failed;
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- 1 b) The Snohomish County refused to investigate or report upon complaints by
2 Plaintiff concerning threats to her and her property;
- 3 c) Snohomish County and City of Gold Bar, through Defendants Reardon,
4 Pennington, Beavers, Hulten and Rudicil authored and posted an untruthful and
5 hurtful “article” about the Plaintiff, to Wikipedia, an on-line “encyclopedia”
6 whose content is contributed by the public. Though the article was removed by
7 Wikipedia some 48 hours later as an “attack piece”, Defendants’ did published in
8 that forum for two days and was republished by other persons and the Sky Valley
9 Chronicle. At the same time, the Defendants authored and posted to Wikipedia a
10 flattering article about Defendant Reardon;
- 11 d) Snohomish County, through Defendants Reardon, Pennington, Parry, Schwarzen,
12 Hulten and Rudicil also sponsored, participated in and encouraged multiple
13 threatening, harmful and untruthful articles directed against Plaintiff and
14 published in an on-line blog known as the Sky Valley Chronicle in collaboration
15 with Defendants Gold Bar and Beavers. The County Defendants also published
16 and/or contributed to attack pieces on various other internet sites accessible to
17 them, including the Sky Valley Chronicle, the Seattle Times and the Seattle
18 Weekly. The attack pieces accused the Plaintiff, among other things, of being a
19 cyber-stalker, of being professionally unsuccessful, unemployed lawyer, mentally
20 deranged and of being dangerous.
- 21 e) Snohomish County, through Defendant Aaron, John Pennington and the
22 Snohomish County Sheriff’s Office illegally requested and disseminated criminal
23 records from the Washington State Patrol and the Federal Bureau of Investigation
24 records from the Washington State Patrol and the Federal Bureau of Investigation
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1 f) Snohomish County, through Defendant John Pennington, a non-client of
2 Plaintiff's, filed multiple complaints against Plaintiff with the Washington State
3 Bar Association misusing county resources.

4 g) Snohomish County, through defendant's public records officer, Diana Rose,
5 refused to obtain and release public records relating to defendant Pennington's
6 WSBA complaints when she received a public records pursuant to RCW 42.56
7 by me.

8 h) accessed mental health information wrongly attributed to the Plaintiff, wrongly
9 disseminated the information publicly.

10 i) Defendants Reardon and Pennington are or were policy making officials within
11 the executive branch of Snohomish County at all times relevant to this complaint.
12 They and the other defendant county officials used Snohomish County resources
13 and time to harass and retaliate against the Plaintiff.

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15 3.11 The retaliation complained of herein has been continuous and on-going up to
16 and including the date of filing this complaint.

17 3.12 The City of Gold Bar, Snohomish County and the individually named Defendants
18 have conspired and agreed with each other to deprive Plaintiff of her constitutional rights
19 as prohibited by 42 USC § 1983.

20 3.13 The violations complained of herein result from policy or custom of the City of
21 Gold Bar and/or Snohomish County.

22 **IV. 42 USC § 1983 CAUSE OF ACTION**

23 4.1 The defendants' retaliation against Plaintiff deprives her of rights secured by the
24 First Amendment to the United States constitution by person who act under color of state
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1 law. The retaliation wrongly deprives citizens, including Plaintiff, of First Amendment
2 Rights and impermissibly chills exercise of those rights by the plaintiff and similarly
3 situated citizens.

4 4.2 The adoption by the City of Gold Bar of its Ordinance 10-14 constitutes a
5 wrongful act of retaliation against Plaintiff, depriving her of rights secured by the First
6 Amendment to the United States constitution by persons who acted under color of state
7 law. The ordinance wrongly deprives citizens, including Plaintiff, of First Amendment
8 Rights and impermissibly chills exercise of those rights by the plaintiff and similarly
9 situated citizens. In addition, the attempted delegation of arbitrary and capricious
10 authority to administrative officials deprives Plaintiff of liberty and due process rights
11 secured and protected by the First, Fifth and Fourteenth Amendments to the United
12 States constitution.

13 4.3 The adoption by the City of Gold Bar of its Finance Committee constitutes a
14 wrongful act of retaliation against Plaintiff, depriving her of rights secured by the First
15 Amendment to the United States constitution by persons who acted under color of state
16 law. The Finance Committee wrongly deprives all citizens, including Plaintiff, of First
17 Amendment Rights and impermissibly chills exercise of those rights by the plaintiff and
18 similarly situated citizens. In addition, the attempted delegation of arbitrary and
19 capricious authority to friends of Gold Bar administrative officials deprives Plaintiff of
20 liberty and due process rights secured and protected by the First, Fifth and Fourteenth
21 Amendments to the United States constitution.

22 4.4 The Defendants have conspired with each other to retaliate against the Plaintiff
23 for her exercise of constitutionally secured rights.
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1 4.5 The wrongful violations, acts and omissions alleged herein have proximately and
2 actually caused damages to the Plaintiff for loss of earning capacity, out-of-pocket
3 losses, impairment of personal and business reputation, personal humiliation and fear,
4 and mental anguish and suffering in an amount to be proved at trial.

5 4.6 The Defendants have demonstrated that they intend to continue their wrongful
6 conduct. The Plaintiff seeks equitable relief in the form of a permanent injunction
7 against the City of Gold Bar from enforcing its Ordinance 10-14 and a decree
8 invalidating the ordinance.

9 4.7 Plaintiff alleges that the conduct of the individual Defendants was motivated by
10 evil and malicious intent and / or that their conduct involves reckless or callous
11 indifference to the Plaintiffs constitutional rights and that this is a proper case for
12 awarding her punitive damages.

13 4.8 Plaintiff alleges that this is a proper case for the award of her costs and prevailing
14 party attorney fee as provided by 42 USC § 1988.
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16 **V. JURY DEMAND.**

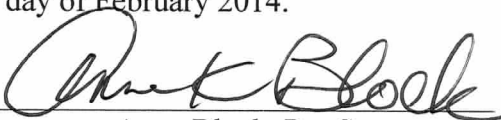
17 5.1 Plaintiff, by and through his attorney of record, pursuant to Federal Rule of Civil
18 Procedure 38, demands trial by jury of all issues triable by jury.
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21 **VI. PRAYER FOR RELIEF**

22 WHEREFORE, Plaintiff Anne Block demands judgment as follows:
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- 1 A. For a Judgment awarding to Plaintiff against the Defendants, jointly and severally,
2 compensatory damages in the minimum amount of \$ 325,000.00 or in such greater
3 amount as shall be proved at trial;
- 4 B. For a decree in favor of the Plaintiff against the Defendant City of Gold Bar restraining
5 enforcement of its Ordinance 10-14 and invalidating the ordinance.
- 6 C. For a decree in favor of the Plaintiff against the Defendant City of Gold Bar restraining
7 its Finance Committee from any further meetings until such time the city passes an
8 Ordinance notifying the public of all meetings pursuant to RCW 42.30 (Open Public
9 Meetings Act).
- 10 D. For a Judgment awarding Plaintiff against the individual Defendants, jointly and
11 severally punitive damages in the minimum amount of \$1,000,000.00 or in such greater
12 amount as shall be proved at trial.
- 13 E. For an award of costs and prevailing party attorney fees against the Defendants jointly
14 and severally.
- 15 F. Such other and further relief as this Court deems just and equitable under the
16 circumstances of this case.
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19 Dated this 18th day of February 2014.

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